

Message

From: Cooper, Jamal [cooper.jamal@epa.gov]
Sent: 8/28/2019 7:04:35 PM
To: Gettle, Jeaneanne [Gettle.Jeaneanne@epa.gov]; Gordon, Lisa Perras [Gordon.Lisa-Perras@epa.gov]; Bouma, Stacey [Bouma.Stacey@epa.gov]; Able, Tony [Able.Tony@epa.gov]; Wetherington, Michele [Wetherington.Michele@epa.gov]; Ghosh, Mita [Ghosh.Mita@epa.gov]; Allenbach, Becky [Allenbach.Becky@epa.gov]; Palmer, Leif [Palmer.Leif@epa.gov]
CC: Danois, Gracy R. [Danois.Gracy@epa.gov]
Subject: RE: Pre-briefing on GA Narrative call-in #: **Ex. 6 Personal Privacy (PP)**
Attachments: 2018 Oct 5 GA EPD Request for Additional Information.pdf; California Dissproval Letter June 2019.pdf; GA Narrative Brief-08262019.docx; Attachment C-EPA Historical Non-substantive Examples.docx

-----Original Appointment-----

From: Gettle, Jeaneanne <Gettle.Jeaneanne@epa.gov>
Sent: Tuesday, August 13, 2019 3:30 PM
To: Gettle, Jeaneanne; Cooper, Jamal; Gordon, Lisa Perras; Bouma, Stacey; Able, Tony; Wetherington, Michele; Ghosh, Mita; Allenbach, Becky; Palmer, Leif
Cc: Danois, Gracy R.
Subject: Pre-briefing on GA Narrative call-in #: (404) 562-9978 code: 629978#
When: Wednesday, August 28, 2019 4:00 PM-4:30 PM (UTC-05:00) Eastern Time (US & Canada).
Where: Conference Room15C

POC: Jamal Cooper 2-9314

Briefing for the RA is set for Sept. 9th.

Purpose of Meeting:

Pre-briefing before briefing RA on the GA Narrative WQS Revision submitted by GA EPD, received on August 14, 2018.

Background:

GAEPD submitted two revisions to their water quality standards (WQS) "free from" narrative criteria. We recommend a partial approval/disapproval. EPA would approve revision #1, changing the words, "legitimate uses" to "designated use of the water body" and due to lack of justification, disapprove revision #2, adding the word, "unreasonably". GAEPD states that the revisions are a clarification only and do not change the stringency of the narrative. EPA staff found the change was substantive, and would be weaker than the national recommended criteria. EPA sent a letter on October 5, 2018, requesting the State clarify its interpretation of the court cases and provide documentation including methods and analysis for each parameter to demonstrate how "unreasonably" interfere will protect the most stringent designated use. The EPA received a memo response on November 2, 2018. And did not receive new technical information including "methods used and analyses conducted to support water quality standards revisions" to satisfy that requirement in 40 C.F.R. 131.6 and insufficient information for the analysis of the required effects determinations on species for ESA Section 7 consultation. Deadline for approval was October 13, 2018 and disapproval was by November 12, 2018.